

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

American Civil Liberties of Missouri)	
Foundation, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 2:13-cv-4223-BP
)	
George A. Lombardi,)	
)	
Defendant.)	

Affidavit of Grant R. Doty

I, Grant R. Doty, being first duly sworn upon my oath, state the following:

1. I am currently a Staff Attorney at the American Civil Liberties Union of Missouri Foundation (ACLU-MO); am over the age of 18; am legally competent to make a affidavit; and do so on the basis of personal knowledge.

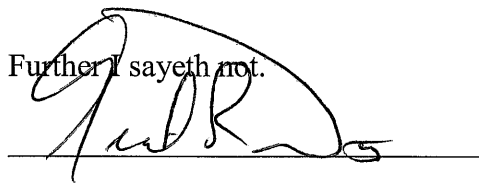
2. On October 24, 2013, I reviewed documents the ACLU-MO obtained in response to Sunshine Law requests to the Missouri Department of Corrections in 2010 and 2011.

3. ACLU-MO has in its possession twenty-four records provided by the Missouri Department of Corrections that identify the suppliers of chemicals that will be utilized for lethal injection under the October 18, 2013, protocol, including sodium chloride and sodium pentobarbital.

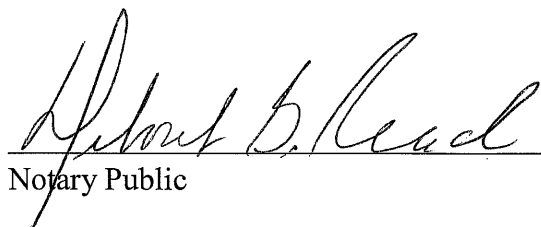
4. In addition, ACLU-MO has in its possession sixteen records that may identify a person as a member or former member of the execution team.

5. ACLU-MO has refrained from disclosing the identity of the suppliers of the drugs referenced in ¶ 3 and the records reference in ¶¶ 3-4 to avoid violating Mo. Rev. Stat. § 546.720.

Further I sayeth not.



Subscribed and sworn to before me on October 24, 2013, by the individual personally known to me as Grant R. Doty.


Notary Public